



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

November 22, 2004

REPLY TO THE ATTENTION OF

VIA FEDERAL EXPRESS

RRG Clayton Chemical Site (soil  
removal)

Mr. Douglas R. Kelly, President  
Imperial Home Decor Group, Inc.  
23645 Mercatille Rd.  
Cleveland, OH 44122

EPA Region 5 Records Ctr.



285370

Re: Clayton Chemical Site General Notice of Potential Liability  
letter.

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site, and is planning to spend public funds to control and investigate these releases. This action will be taken by U.S. EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9601 et seq., (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, stat. 1613 (1986) (SARA), unless U.S. EPA determines that such action will be done properly by a responsible party. Responsible parties under CERCLA include the current and former owners and operators, and persons who generated the hazardous substances or were involved in transport, treatment, or disposal of them at the Site. Under Section 107(a) of CERCLA, where the Agency uses public funds to achieve the cleanup of the hazardous substances, responsible parties are liable for all costs associated with the removal or remedial action and all other necessary costs incurred in cleaning up the Site, including investigation, planning and enforcement.

The U.S. EPA is currently planning to conduct the following actions at the above referenced Site:

1. Develop and implement a site health and safety plan;
2. Provide security for the site;

3. Sample, characterize, and consolidate for removal and disposal all contaminated soils found on-site, all solids found in tanks (a.k.a. tank bottoms) and any other hazardous waste solid material found on-site;
4. Transport and dispose of all characterized hazardous substances, pollutants, wastes, or contaminants at a RCRA approved disposal facility in accordance with the U.S. EPA Off-Site Rule, 40 CFR 300.440.
5. Backfill the excavated site areas with clean material and topsoil. Restore and vegetate excavated areas to prevent soil erosion.

U.S. EPA has received information that you may be a potentially responsible party (PRP) at this Site. The information used by U.S. EPA in part to make this determination was provided by the group of PRPs that conducted the initial liquids removal action at this Site. The report used by U. S. EPA titled "The RRG/Clayton Liquids Removal, Investigation Report" included a volumetric ranking of PRPs that may have sent liquids, solids and or other material to be processed at the Site. Based on U.S. EPA's review and analysis of the volumetric ranking in that report; the Agency is notifying all PRPs that sent or contributed 75,000 gallons or more to the Site that they are PRPs. This group consists of only 73 of the approximate 2,800 PRPs that sent material to this Site to be processed. However, U.S. EPA calculations indicate that the initial group of 73 PRPs contributed over 72% of the wastes processed at the Site.

The Agency's decision to initially only Notice the 73 largest PRPs at this Site is based on a number of factors. First, U. S. EPA wants to begin a removal action at this Site as soon as possible and having a limited number of PRPs in the group will make this possible. Second, EPA believes that having the small initial group of 73 PRPs will make it easier for them to come to agreement and decisions on the many actions that need to be made during the course of the Site clean up. Finally, U. S. EPA plans to notice the remaining PRPs identified in the aforementioned report but would like input from this initial PRP group on how best to notify them of their responsibility for this Site.

U.S. EPA is inviting the initial group of 73 PRPs to meet with Agency officials on either Tuesday, December 7, 2004, at 1:00 p.m. or on Wednesday December 8, 2004 at 10:00 a.m. Both meetings will be held at the East St. Louis Public Library 5300 State Street, East St. Louis, Illinois 62203. It is only necessary to attend one of the meetings.

By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a PRP, to reimburse U.S. EPA for costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

As a potentially responsible party, you should notify U.S. EPA in writing within ten (10) days after the December 8, 2004 PRP meeting, regarding your willingness to perform or finance the activities described above. If U.S. EPA does not receive a timely response, U.S. EPA will assume that you or your organization does not wish to negotiate a resolution of its potential responsibility in connection with the Site and that you or your organization has declined any involvement in performing the response activities.

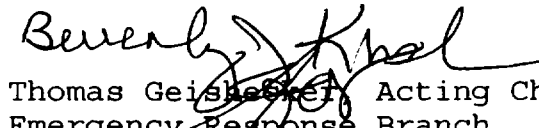
Your letter should indicate the appropriate name, address, and telephone number for further contact with you. If you are already involved in discussions with state or local authorities, engaged in voluntary cleanup action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions. Your response should be sent to:

Tom Turner  
Associate Regional Counsel  
U.S. EPA - Region V  
Office of Regional Counsel (C-14J)  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

If you need further information regarding this letter, you may contact Tom Turner of the Office of Regional Counsel at, (312) 886-6613.

Due to the nature of the problem at this site and the attendant legal ramifications, U.S. EPA strongly encourages you to submit a written response within the time frame specified herein. We hope you will give this matter your immediate attention.

Sincerely,

  
Thomas Geiskes, Acting Chief  
Emergency Response Branch

Attachment: A-General Notice PRP list.

## **APPENDIX A**

### **List of Potential Responsible Parties Receiving a General Notice Letter for the RRG Clayton Chemical Site (Soil Removal)**

**NASCOTE INDUSTRIES, INC.**  
Margaret A. Coughlin Esq.  
Dickinson Wright, PLLC  
38525 Woodward Ave., Suite 2000  
Bloomfield Hills, MI 48304-2970

**FORD MOTOR COMPANY**  
Sir Nicholas V. Scheele, President  
Ford Motor Company  
One American Road  
Dearborn, MI 48126

**SIGMA-ALDRICH CORPORATION**  
Mr. Jai Nagarkatti, President  
Sigma-Aldrich Corporation  
3050 Spruce Street  
St. Louis, MO 63103

**MALLINCKRODT INC.**  
Mr. Peter S. Strassner  
Thompson Coburn LLP  
One US Bank Plaza  
St. Louis, MO 63101-1693

**BLISS WASTE OIL COMPANY**  
Mr. Jerry Bliss, Owner  
Bliss Waste Oil Company  
149 Strecker Road  
Ballwin, MO 63011

**A-1 OIL CORPORATION**  
Mr. Jerry Bliss, Registered Agent  
A-1 Oil Corporation  
149 Strecker Road  
Ballwin, MO 63011

**DAIMLERCHRYSLER CORPORATION**  
Mary Ericson Waters  
Daimler-Chrysler Corporation  
1000 Chrysler Drive  
CIMS 482-13-62  
Auburn Hills, MI 48326-2766

**LEAR CORPORATION**  
Mr. Robert E. Rossiter, President  
Lear Corporation  
21557 Telegraph Road  
Southfield, MI 48034

**U.S. PAINT CORPORATION**  
Mr. John Duchardt, President  
U.S. Paint Corporation  
831 South 21st Street  
St. Louis, MO 63103

**STERLING LACQUER MANUFACTURING COMPANY**  
Mr. Leo V. Mitchell, President  
Sterling Lacquer Manufacturing Company  
3150 Brannon Ave.  
St. Louis, MO 63139

**SUPERIOR EQUIPMENT COMPANY, INCORPORATED**  
Bruce A. Morrison Esq.  
Green, Hennings & Henry, LLP  
705 Olive Street, Suite 614  
St. Louis, MO 63101-2208

**THE SWAN CORPORATION**  
Greensfelder, Hemker & Gale, P.C.  
2000 Equitable Building  
10 South Broadway  
St. Louis, MO 63102-1774

**PLASTIC PRODUCTS CO., INC.**  
Ms. Marlene Messin, President  
Plastic Products Co., Inc.  
30355 Akerson Street  
Lindstrom, MN 55045

**HUSSMAN CORPORATION**  
Mr. Randy Smith, President  
Hussman Corporation  
12999 St. Charles Rock Road  
Bridgeton, MO 63044

**UOP LLC**

Mr. Carlos Guimaraes, President  
UOP LLC  
25 East Algonquin Road  
Building A  
Des Plaines, IL 60016

**NATIONAL COATINGS INC.**

S. David Simpson  
Hattery, Simpson & West  
Suite 402 Hill Arcade  
Galesburg, IL 61402

**CERRO FLOW PRODUCTS, INC.**

Richard F. Ricci Esq.  
Lowenstein Sandler PC  
65 Livingston Avenue  
Roseland, NJ 07068-1791

**NORTH EAST RECYCLING TRANSPORTATION, INC.**

James P. Oliver Esq., Registered Agent  
Squire, Sanders & Dempsey L.L.P.  
for North East Recycling Transportation, Inc.  
4900 Key Tower, 127 Public Square  
Cleveland, OH 44114

**OLIN CORPORATION**

Mr. Joseph D. Rupp, President  
Olin Corporation  
501 Merritt 7  
Norwalk, CT 06856

**MONSANTO COMPANY**

Mr. Hugh Grant, President  
Monsanto Company  
800 N. Lindbergh Blvd.  
St. Louis, MO 63167

**NORFOLK SOUTHERN RAILWAY COMPANY**

Mr. Charles W. Moorman, President  
Norfolk Southern Railway Company  
3 Commercial Place  
Norfolk, VA 23510

**SEQUA CORPORATION**

Mr. Norman E. Alexander, Chief Executive Officer  
Sequa Corporation  
200 Park Avenue  
New York, NY 10166

**BOBEN MANUFACTURING COMPANY**

Mr. Robert H. Slosberg, Registered Agent  
Boben Manufacturing Company  
11 Nantucket Ln.  
St. Louis, MO 63132

**AAD DISTRIBUTION & DRY CLEANING SERVICES, INC**

Mr. Hormoz Pourat c/o Ms. Paula Silverbush Pourat  
for AAD Distribution and Dry Cleaning Services, Inc.  
5107 Enfield Avenue  
Encino, CA 91316

**TEVA PHARMACEUTICALS USA, INC.**

Gail S. Port Esq.  
Proskauer Rose, LLP  
1585 Broadway  
New York, NY 10036

**DIOSYNTH, INC.**

Mr. C. Nederveen, President  
Diosynth, Inc.  
2136 South Wolf Road  
Des Plaines, IL 60018

**COLEMAN CHEMICAL, INC.**

Mr. Albert R. Puntureri, President  
Coleman Chemical, Inc.  
75 Sanger St.  
Peoria, IL 61602

**TNEMEC COMPANY, INC.**

Mr. Peter F. Cortelyou, President  
Tnemec Company, Inc.  
6800 Corporate Dr.  
Kansas City, MO 64120

**MCINTYRE GROUP, LTD.**

Eric E. Boyd Esq.  
Seyfarth Shaw LLP  
55 E. Monroe St., Suite 4200  
Chicago, IL 60603

**EXXONMOBIL OIL CORPORATION**

Mr. Rex W. Tillerson, President  
ExxonMobil Oil Corporation  
5959 Las Colinas Blvd.  
Irving, TX 75039-2298

**CHICAGO DRUM, INC.**

Mr. Buddy Ross, President  
Chicago Drum, Inc.  
6829 Flintlock Road  
Houston, TX 77040

**UNIVERSAL PACKAGING CORPORATION**

Ms. Gloria Cobb, President  
Universal Packaging Corporation  
4761 Moline Street  
Denver, CO 80239

**WALKER PADUCAH CORP.**

Mr. Craig E. Philips, President  
Walker Paducah Corp.  
4400 Harding Road  
Nashville, TN 37205

**SAFETY-KLEEN SYSTEMS, INC.**

Frederick J. Florjancic Jr., President & CEO  
Safety-Kleen Systems, Inc.  
5400 Legacy Dr.  
Cluster II, Bldg. 3  
Plano, TX 75024

**KEYSTONE CONSOLIDATED INDUSTRIES, INC.**

Mr. David Cheek, President  
Keystone Consolidated Industries, Inc.  
dba Keystone Steel & Wire Company  
7000 SW Adams St.  
Peoria, IL 61641

**CENTRAL ILLINOIS PUBLIC SERVICE COMPANY**

Mr. Gary L. Rainwater, President  
Central Illinois Public Service Company  
One Ameren Plaza  
1901 Chouteau Avenue  
St. Louis, MO 66149

**LYON METAL PRODUCTS, L.L.C.**

Patrick M. Kinnally Esq.  
Kinnally, Krentz, Loran, Hodge & Herman, P.C.  
for Lyon Metal Products LLC  
Aurora, IL 60507-5030

**RILEY BROTHERS COMPANY**

Mr. James S. Jennison, President  
Jennison Industries, Inc.  
on behalf of Riley Brothers Company  
106 Washington Avenue  
Burlington, IA 56201

**TITAN WHEEL CORPORATION OF ILLINOIS**

Mr. Ronald B. Schildt, President  
Titan Wheel Corporation of Illinois  
2701 Spruce Street  
Quincy, IL 62301

**SILGAN CONTAINERS CORPORATION**

Mr. James D. Beam, President  
Silgan Containers Corporation  
21800 Oxnard St., Suite 600  
Woodland Hills, CA 91367

**INX INTERNATIONAL INK COMPANY**

Mr. Richard Clendenning, President  
INX International Ink Co.  
651 Bonnie Lane  
Elk Grove Village, IL 60007

**PENN ALUMINUM INTERNATIONAL, INC.**

John Nichols  
Penn Aluminum International, Inc.  
1117 North 2nd St.  
Murphysboro, IL 62966

AFTON CHEMICAL CORPORATION  
Mr. C. S. Warren Huang, President  
Afton Chemical Corporation  
500 Spring St.  
Richmond, VA 23219

KOCH INDUSTRIES, INC.  
Mr. Joseph Moeller, President  
Koch Industries, Inc.  
4111 E. 37th St. North  
Wichita, KS 67720

BEMIS COMPANY, INC.  
Mr. Jeffrey Curler, President  
Bemis Company, Inc.  
222 S. 9th St.  
Suite 2300  
Minneapolis, MN 55402

VALENTEC WELLS, LLC  
President  
Valentec Wells, LLC  
Lake City Army Ammunition Depot  
Building 2  
Independence, MO 64051

STEELCOTE MANUFACTURING COMPANY  
Mr. John Milner, President  
Steelcote Manufacturing Company  
One Steelcote Square  
St. Louis, MO 63103

AMERICAN RECREATION PRODUCTS, INC.  
Mr. George J. Grabner Jr., President  
American Recreation Products, Inc.  
1224 Fern Ridge Parkway  
St. Louis, MO 63141

BAKER PETROLITE CORPORATION  
Ms. Halina E. Caravello  
Baker Petrolite Corporation  
12645 West Airport Blvd.  
Sugar Land, TX 77478

CHEMISPHERE CORPORATION  
Mr. Robert F. Schwent, President  
Chemisphere Corporation  
2101 Clifton Ave.  
St. Louis, MO 63139

IMPERIAL HOME DECOR GROUP, INC.  
Mr. Douglas R. Kelly, President  
Imperial Home Decor Group, Inc.  
23645 Mercatile Rd.  
Cleveland, OH 44122

MARCHEM CORPORATION  
Mr. Sandon L. Wool, President  
Marchem Corporation  
2500 Adie Rd.  
Maryland Heights, MO 63043

DON V. DAVIS COMPANY  
Ms. Ophelia Davis, Owner  
Don V. Davis Company  
5955 Goodfellow Blvd.  
St. Louis, MO 63147

CURWOOD, INC.  
Mr. Tom Sall, President  
Curwood, Inc.  
2200 Badger Ave.  
Oshkosh, WI 54903

THE KANSAS CITY SOUTHERN RAILWAY  
COMPANY  
Mr. Michael Haverty, President  
The Kansas City Southern Railway Company  
427 W. 12th St.  
Kansas City, MO 64121

ARRIS INTERNATIONAL, INC.  
Mr. Randy Brogdon Esq.,  
Troutman Sanders LLP  
for Arris International, Inc.  
600 Peachtree St., Ste. 5200  
Atlanta, GA 30308-2216



SAFETY-KLEEN (TS), INC.  
Mr. David M. Sprinkle, President  
Safety-Kleen (ts), Inc.  
5400 Legacy Dr.  
Cluster II, Bldg. 3  
Plano, TX 75024

MITSUBISHI MOTORS NORTH AMERICA, INC.  
Mr. Pierre M. Gagnon, President  
Mitsubishi Motors North America, Inc.  
6400 Katella Ave.  
Cypress, CA 90630

THE DOW CHEMICAL COMPANY  
Mr. Andrew N. Liveris, President  
The Dow Chemical Company  
2030 Dow Center  
Midland, MI 48674

SUPERIOR OIL CO., INC.  
Mr. Ray Roembke Jr., President  
Superior Oil Co., Inc.  
400 W. Regent St.  
Indianapolis, IN 46225

LYON WORKSPACE PRODUCTS, LLC  
Mr. R. P. Washington, Chairman  
Lyon Workspace Products, LLC  
420 North Main Street  
Montgomery, IL 60538

NORDENIA U.S.A., INC.  
Julie O'Keefe Esq.,  
Armstrong Teasdale, LLP  
for Nordenia U.S.A., Inc.  
One Metropolitan Square, Suite 2600  
St. Louis, MO 63102-2740

METAL CONTAINER CORPORATION  
Mr. Joseph P. Sellinger, President  
Metal Container Corporation  
One Busch Place  
St. Louis, MO 63118

ALLIED HEALTHCARE PRODUCTS, INC.  
Mr. Earl R. Refsland, President  
Allied Healthcare Products, Inc.  
1720 Sublette Ave  
St. Louis, MO 63110

CROWN BEVERAGE PACKAGING, INC.  
Mr. Robert J. Truitt, President  
Crown Beverage Packaging, Inc.  
One Crown Way  
Philadelphia, PA 19154

CONOPCO, INC.  
Mr. Charles B. Strauss, President  
Conopco, Inc.  
700 Sylvan Ave.  
Englewood Cliffs, NJ 07632

DJR HOLDINGS, INC.  
Mr. Rodney D. Jarboe, President  
DJR Holdings, Inc.  
1019 Skinker Parkway  
Hazelwood, MO 63042

LINCOLN INDUSTRIAL CORPORATION  
Mr. Mark T. Schroepfer, President  
Lincoln Industrial Corporation  
One Lincoln Way  
St. Louis, MO 63120